

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department on its own	)	
Motion as to the propriety of the rates and	)	
charges set forth in M.D.T.E No. 17, filed with	)	
the Department on May 5, 2000 and June 14, 2000	)	<b>D.T.E. 98-57, Phase III</b>
to become effective October 2, 2000 by New	)	
England Telephone and Telegraph Company	)	
d/b/a Bell Atlantic – Massachusetts	)	
_____	)	

**VERIZON MASSACHUSETTS'**  
**MOTION TO FILE REPLY COMMENTS**

Verizon Massachusetts (“Verizon MA”) moves for leave to respond to comments filed by AT&T Communications of New England, Inc. (“AT&T”) and Covad Communications Company (“Covad”) on April 9, 2002, relating to Verizon’s first-office application of its Digital Subscriber Line (“DSL”) access service in Massachusetts. This is necessary to address misstatements made by AT&T and Covad regarding Verizon’s preliminary plans for a DSL offering at remote terminals, as well as their recommendations for the future course of this pending proceeding.

On March 15, 2002, the Department specifically sought comments on whether Verizon’s public notice regarding its first-office application should be included in the evidentiary record in D.T.E. 98-57 (Phase III) and what effect, if any, this development would have on that docket. In their comments, AT&T and Covad mischaracterize Verizon’s conduct and potential DSL offering and inappropriately propose further extensive investigation by the Department. Verizon MA should have an opportunity to

respond to the points raised in those parties' comments and provide relevant information for the Department's consideration.

Finally, it is Verizon MA's understanding that the Attorney General will also move to respond to parties' comments on this matter. Verizon MA has no objection to that forthcoming request, and suggests that reply comments be filed simultaneously at least one week following the Department's ruling on these Motions.

For the foregoing reasons, the Department should grant Verizon MA's Motion for leave to submit reply comments in this proceeding.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorney,

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Dated: April 16, 2002